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VIA ECF

March 15, 2022

Hon. Nelson S. Roman
United States District Court Judge
United States Courthouse
300 Quarropas Street
White Plains, New York 10601

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 3/15/2022

Re: Waterkeeper Alliance, Inc. v. Spirit of Utah Wilderness, Inc., 10 CV 1136 (NSR-LMS)

Dear Judge Roman:

I am writing as counsel for Jeffrey Salt with respect to the Court's order (Doc 253) dated 1/14/22. In this order the Court granted an extension in the stay of the arrest warrant until March 16, 2022, to allow Mr. Salt time to complete compliance with the Court's previous orders with respect to document production and interrogatory response. Because of Mr. Salt's continuing medical problems and worsening health conditions as described in detail and documented in the attached email and exhibits, I am requesting on Mr. Salt's behalf a further extension in the stay to produce the outstanding documents until July 10, 2022. Mr. Salt's chronic medical problems have made it impossible for him to timely comply with all the order requirements regarding document production.

Attached are the following exhibits in support of his application for an extension based upon good cause:

Exhibit A Positive COVID – 19 test results

Exhibit B Email of Jeffrey Salt dated March 15, 2022, describing his medical conditions

Exhibit C Additional Medical records.

As noted in prior requests for a stay, Mr. Salt has complied with the primary requirements of the judgment (ECF 100, 160) insofar as he submitted proof through counsel that he ceased infringing on Plaintiff's trademarks (ECF 195) and publicly posted the Statement required by the 2d contempt order (ECF 160, 225).

Arresting Mr. Salt and confining him to a federal detention facility will in no way facilitate his ability to comply with any requirement of producing documents; it would have just the opposite effect. Given that he has ceased using Waterkeeper Marks and provided a detailed

MEMO ENDORSED

financial affidavit and supporting documentation and considering his documented medical ailments I urge the Court to exercise its discretion to grant the requested further stay.

In summary, I am requesting that the Court grant the applications contained in this letter together with such other and further relief as the Court deems appropriate in the interest of justice.

Thank you for considering this request.

Respectfully submitted,

/S/ Joseph A. Vita

Joseph A. Vita

Cc: Jeffrey Salt via EMAIL

The arrest warrant will be stayed until March 23, 2022 to allow Plaintiff time to respond to Mr. Salt's request. Mr. Salt is also directed to indicate in writing what, if any, documents and responses to interrogatories he has provided to Plaintiff on or before March 22, 2022.

Dated: March 15, 2022
White Plains, NY

SO ORDERED:



NELSON S. ROMÁN
United States District Judge